

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC,)	CASE NO. 1:19-cv-145
)	
PLAINTIFF,)	JUDGE DAN AARON POLSTER
)	MAGISTRATE JUDGE THOMAS PARKER
V.)	
)	
SOUTH UNIVERSITY OF OHIO, LLC, <i>et</i>)	
<i>al.</i> ,)	
)	
DEFENDANTS.)	

FILED
MAR 29 2019
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

**MOTION TO REQUEST RECEIVER PROVIDE COURT AND EMPLOYEES OF
WESTERN STATE COLLEGE OF LAW UPDATED INFORMATION REGARDING
EMPLOYEE BENEFITS**

Cheyanna Jaffke, a tenured professor at Western State College of Law at Argosy, is an employee of Dream Center Education Holdings, LLC (DCEH). This court recognized Cheyanna Jaffke as a party/ interpleader to the above titled case. (Doc #100)

On March 8, 2019, Benefit Administrative Systems. LLC (BAS) filed with this court a motion to intervene in this case. (Doc #127) BAS is the entity that managed DCEH health insurance, which was self-insured. Cheyanna Jaffke then learned that BAS had not been paid nor had any medical expenses it fronted been reimbursed by DCEH by a telephone call with Aaron Applebaum, attorney for BAS. Cheyanna Jaffke

informed her boss, Dean Allen Easley, that we might have lost our health insurance or that there was at least an issue with it. Dean Easley communicated with the receiver and it was discovered that our health insurance had been put on hold. (See exhibit 1, an e-mail from DCEH re: health insurance)

March 1, 2019 paycheck (See exhibit 2) of Cheyanna Jaffke indicates withholding for the following:

- California SDI (state disability insurance)
- California State Income Taxes
- Federal Withholding
- Medicare
- Social Security
- 401(k) contribution
- Dental base premium
- Health Saving Account- Pre Tax
- High Deductible Health – Pre tax
- Long Term Disability Buy up

March 15, 2019 paycheck (See exhibit 3) of Cheyanna Jaffke indicates withholding for the following:

- California SDI (state disability insurance)
- California State Income Taxes
- Federal Withholding
- Medicare
- Social Security
- 401(k) contribution

This court on March 18, 2019 (Doc. #190) directed the receiver and Mr. Applebaum to work to exclude the receivership entities from the contract. This leaves employees of Western State College of Law without health insurance.

Cheyanna Jaffke asks this court to direct the receiver or his agent to provide her with the following information:

1. A letter that indicates that her employer provided health insurance has been cancelled, so that she can obtain health insurance through the marketplace.
2. The name of the Long-Term Disability Insurance provider and policy number as well as the last time collected premiums were transferred to the insurance provider.
3. The name of the Short-Term Disability Insurance provider and policy number as well as the last time collected premiums were transferred to the insurance provider.
4. The name of the Life Insurance provider and policy number as well as the last time collected premiums were transferred to the insurance provider.
5. The name of the Dental Insurance provider and policy number as well as the last time collected premiums were transferred to the insurance provider.
6. The name of the Vision Insurance provider and policy number as well as the last time collected premiums were transferred to the insurance provider.

Cheyanna Jaffke also requests that this court direct the receiver or his agent to confirm that all withholdings from her paycheck for her 401k has been transferred to Fidelity up to and including the March 29, 2019 paycheck.

Additionally, Cheyanna Jaffke requests that this court direct the receiver or his agent to refund any money withheld from her paychecks that has not been transferred by March 26, 2019 to any insurance provider.

Furthermore, Cheyanna Jaffke requests that this court direct the receiver or his agent to notify this court that Federal withholding and State of California withholding

(payroll taxes) has been paid to the appropriate governmental entities once the required quarterly employment tax returns are filed by April 15, 2019.

Finally, Cheyanna Jaffke requests this court treat all other employees at Western State College of Law who are similarly situated in the same manner as her.

Dated: March 26, 2019

Respectfully submitted,

A handwritten signature in dark ink, appearing to be 'C. Jaffke', is written over a horizontal line.

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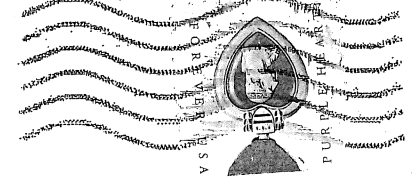
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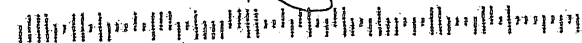
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U.S. District Court
Northern District of Ohio
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